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Attorneys for Defendant, AMERICAN
CASUALTY COMPANY OF READING,
PA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PHILIP RUDOLPH JOHNSON,

Plaintiff,

v.

AMERICAN CASUALTY COMPANY
OF READING PA, a Pennsylvania
Corporation, DOES 1 -100,

Defendants.

CASE NO. 4:09-cv-02125-SC

The Hon. Samuel Conti
Courtroom 1

**STIPULATION REQUESTING
ORDER EXTENDING TIME TO
COMPLETE MEDIATION; AND
[PROPOSED] ORDER**

Action Filed: April 7, 2009
Trial Date: None Set

Plaintiff Philip Johnson and Defendant American Casualty Company of
Reading, PA, by and through their counsel, stipulate and request an Order extending
the time to complete mediation until January 21, 2010 or such other time as the
court directs.

The good cause for this is as follows:

1. On August 18, 2009 the parties stipulated to select mediation as the
ADR process and proposed a November 20, 2009 ADR deadline.

2. On August 20, 2009 the court ordered the matter referred to mediation
with a November 20, 2009 mediation completion deadline.

1 3. On September 9, 2009 the court appointed Arnold B. Haims as the
2 mediator assigned to this case.

3 4. On October 20, 2009 defendant American Casualty Company of
4 Reading, PA filed a motion for summary judgment which motion is currently set for
5 hearing on December 4, 2009. If granted, that motion will completely resolve all
6 claims presented in this suit. Plaintiff intends to oppose the motion.

7 5. The parties have consulted with each other and believe mediation will
8 not be productive until defendant's pending motion for summary judgment is heard
9 and ruled upon.

10 6. Counsel for American Casualty contacted the staff of the mediator, Mr.
11 Haims, and was advised that Mr. Haims has no objection to the court extending the
12 deadline for completing mediation to a time after the hearing on the defendant's
13 motion for summary judgment.

14 7. A status conference is currently scheduled in this action for January 22,
15 2009.

16
17 DATE: November 9, 2009

JON P. KARDASSAKIS
LEWIS BRISBOIS BISGAARD & SMITH LLP

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20 By: 

Jon P. Kardassakis
Attorneys for Defendant, AMERICAN
CASUALTY COMPANY OF READING, PA

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22
23 DATE: November 9, 2009

24 By: 

Thomas G. Lewellyn
Attorneys for Plaintiff PHILIP RUDOLPH
JOHNSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PHILIP RUDOLPH JOHNSON,

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Defendants.

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**[PROPOSED] ORDER GRANTING
EXTENSION OF TIME TO
COMPLETE MEDIATION**

Action Filed:
Trial Date: None Set

Pursuant to the stipulation of the parties, and for good cause shown, it is
Ordered that the time for the parties to complete mediation is extended to January
21, 2010.

November 10, 2009
DATE: ~~December~~ __, 2009

